

George Haines, Esq.  
Nevada Bar No. 9411  
Gerardo Avalos, Esq.  
Nevada Bar No. 15171  
**FREEDOM LAW FIRM, LLC**  
8985 South Eastern Ave., Suite 100  
Las Vegas, NV 89123  
Phone: (702) 880-5554  
FAX: (702) 385-5518  
Email: info@freedomlegalteam.com  
*Attorneys for Plaintiff Carlos Guzman*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Carlos Guzman,

Plaintiff,

v.

Westlake Services, LLC and Speedy  
Recovery, Inc.,

Defendants.

Case No.: 2:24-cv-02236-GMN-NJK

**Discovery Plan and Scheduling  
Order Submitted in Compliance  
with LR 26-1(b)**

On December 31, 2024, Westlake Services, LLC appeared in this case and the Court set a deadline to file a proposed discovery plan and scheduling order by February 14, 2025. Accordingly, Carlos Guzman, Westlake Services, LLC and Speedy Recovery, Inc. (collectively as the “Parties”), by and through their respective counsel, hereby submit this Joint Discovery Plan and Scheduling Order. The parties

will require 180 days of discovery measured from the date that Westlake Services, LLC filed its answer to Plaintiff's complaint.

### DISCOVERY PLAN

The parties propose the following discovery plan and scheduling order:

- |   |                          |                   |
|---|--------------------------|-------------------|
| 1. Initial disclosures .....            | <del>March 3, 2025</del> | February 14, 2025 |
| 2. Amend pleadings and add parties ..   | March 31, 2025           |                   |
| 3. Expert disclosures (initial): .....  | April 30, 2025           |                   |
| 4. Expert disclosures (rebuttal): ..... | May 30, 2025             |                   |
| 5. Discovery cutoff date: .....         | June 30, 2025            |                   |
| 6. Dispositive motions: .....           | July 29, 2025            |                   |
| 7. Pretrial order .....                 | August 28, 2025          |                   |

In the event that dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until **30 days after** decision on the dispositive motions or until further order of the court.

Pretrial Disclosures: The disclosures required by Rule 26(a)(3), and any objections thereto, shall be included in the joint pretrial order.

Extensions or Modifications of the Discovery Plan and Scheduling Order: Applications to extend any date set by the discovery plan, scheduling order, or other order must comply with the Local Rules.

Protective Order: The parties may seek to enter a stipulated protective order pursuant to Rule 26(c) prior to producing any confidential documents.

1        Electronic Service: The parties agree that pursuant to Rules 5(b)(2)(E) and  
2 6(d) of the Federal Rules of Civil Procedure any pleadings or other papers may be  
3 served by sending such documents by email.  
4

5        Alternative Dispute Resolution Certification: The parties certify that they met  
6 and conferred about the possibility of using alternative dispute-resolution processes  
7 including mediation, arbitration, and early neutral evaluation. The parties have not  
8 reached any stipulations at this stage.  
9

10       Alternative Forms of Case Disposition Certification: The parties certify that  
11 they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and  
12 Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01).  
13 The parties have not reached any stipulations at this stage.  
14

15       Electronically Stored Information: The parties have discussed the retention  
16 and production of electronic data. The parties agree that service of discovery by  
17 electronic means, including sending original electronic files by email or on a cd is  
18 sufficient. The parties reserve the right to revisit this issue if a dispute or need arises.  
19  
20

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

1        Electronic evidence conference certification: The parties further intend to  
2 present evidence in electronic format to jurors for the purposes of jury deliberations  
3 at trial. The parties discussed the presentation of evidence for juror deliberations but  
4 did not reach any stipulations as to the method as this early stage.  
5

6        Dated: January 28, 2025.  
7

8        **FREEDOM LAW FIRM**

9        /s/ George Haines

10       George Haines, Esq.  
11       Gerardo Avalos, Esq.  
12       8985 South Eastern Ave., Suite 100  
13       Las Vegas, NV 89123  
14       *Counsel for Plaintiff Carlos Guzman*

15       **DICKINSON WRIGHT PLLC**

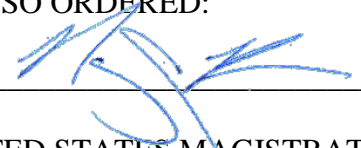
16       /s/ Gabriel A. Blumberg

17       Gabriel A. Blumberg, Esq.  
18       3883 Howard Hughes Parkway, Suite 800  
19       Las Vegas, Nevada 89169-0965  
20       *Counsel for Westlake Services, LLC and*  
21       *Speedy Recovery, Inc.*  
22  
23  
24  
25  
26  
27  
28

## SCHEDULING ORDER

The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for this action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1 , except that initial disclosures must be exchanged by February 14, 2025.

IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE JUDGE

DATED: January 29, 2025